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Mr. Michael Ribordy
On-Scene Coordinator
USEPA Region 5
77 West Jackson Boulevard (SE-5J)
Chicago, IL 60604-3590

INDUSTRIAL

Subject:
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time-Critical Removal Action – Former Plainwell Impoundment
Monthly Report (December 2007)

Date:
January 15, 2008

Dear Mike:

Attached is the tenth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

If you have any questions, please do not hesitate to contact me.

Sincerely,

Contact:
Steve Garbaciak

Phone:
312.332.4937 ext. 12

E-mail:
steve.garbaciak@
arcadis-us.com

Our ref:
B0064530.014

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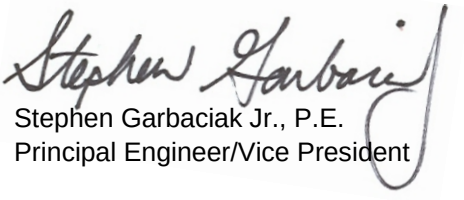

Stephen Garbaciak Jr., P.E.
Principal Engineer/Vice President

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# MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/ KALAMAZOO RIVER SUPERFUND SITE TIME-CRITICAL REMOVAL ACTION (TCRA) – FORMER PLAINWELL IMPOUNDMENT

**REPORT #10, DECEMBER 2007**

**PREPARED BY ARCADIS**
**JANUARY 15, 2008**

**ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP**

**SUBMITTED TO**

**MICHAEL RIBORDY, ON-SCENE COORDINATOR**
**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/**
**Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment**

**REPORT #10, DECEMBER 2007**

## Significant Developments and Activities During the Period

- On December 3, the Kalamazoo River Study Group (KRSG) submitted a summary of construction milestones achieved in 2007 to the United States Environmental Protection Agency (USEPA).

- On December 6, the KRSG submitted a copy of the *29th Weekly Construction Report for the Plainwell TCRA* to USEPA and Michigan Department of Environmental Quality (MDEQ).

- On December 7 and 18, the KRSG submitted copies of analytical data from TCRA sampling activities to USEPA.

- On December 11, the KRSG submitted a copy of the *30th Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On December 17, the KRSG submitted the ninth *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for November 2007 to USEPA.

- On December 18, the KRSG submitted sediment confirmation sampling coordinate data to USEPA and MDEQ.

- On December 18 and 20, the KRSG received copies of analytical data from split sediment samples collected by USEPA during TCRA activities.

- On December 20, the KRSG submitted a copy of the *31st Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On December 27, the KRSG submitted a copy of the *32nd Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On December 31, the KRSG received confirmation from USEPA and United States Fish and Wildlife Service (USFWS) that because all trees for the 2008 construction season are scheduled to be removed by April 1, 2008, no extra precautions need to be taken to protect the endangered Indiana bat tree habitat.

## Data Collected and Field Activities Conducted During the Period

- On December 1, the KRSG continued excavation of soil and sediment in Removal Area 8; continued work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); continued decommissioning and decontamination of the 500 gallons per minute (GPM) water treatment system; and began grading and placing stone on the

east bank of the west channel adjacent to the Plainwell Dam. Prior to discharge, wastewater samples W_SA3S_Influ_0011, W_SA3S_MidA_0010, W_SA3S_MidB_0011, W_SA3S_EffluA_0010 and W_SA3S_EffluB_0011 were collected from the influent port, the right midpoint port, the left midpoint port, the right effluent port, and the left effluent port, respectively, of the 25 GPM water treatment system located at Staging Area 3S. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan (non-TSCA material) for disposal.

- During the week of December 3, the KRSG continued excavation of soil and sediment in Removal Area 8; excavated a section of material located near a Consumers Energy utility pole in Removal Area 7; continued work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); continued installation of the water control structure (WCS); continued decommissioning and decontamination of the 500 GPM water treatment system; and continued grading and placing stone on the east bank of the west channel adjacent to the Plainwell Dam. Prior to discharge, wastewater samples W_SA3S_Influ_0012, W_SA3S_Influ_0013, and W_SA3S_Influ_0014 (influent port), W_SA3S_MidA_0011, W_SA3S_MidA_0012, and W_SA3S_MidA_0013, (midpoint port, right side), W_SA3S_MidB_0012, W_SA3S_MidB_0013, and W_SA3S_MidB_0014, (midpoint port, left side), W_SA3S_EffluA_0011, W_SA3S_EffluA_0012, and W_SA3S_EffluA_0013, (effluent port, right side), W_SA3S_EffluB_0012, W_SA3S_EffluB_0013, and W_SA3S_EffluB_0014, (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 3S. A duplicate of sample W_SA3S_MidA_0012 (W_SA3S_Dup_0004) was also collected. PCB wipe samples were collected from the first carbon tank (Carbon) and the second through fifth holding tanks (Tank 2 through Tank 5) of the 500 GPM water treatment system to confirm that the tanks had been properly decontaminated prior to demobilization. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan (non-TSCA material) for disposal.

- During the week of December 10, the KRSG completed excavation of soil and sediment in Removal Area 8; continued work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); completed installation of the WCS; completed decommissioning and decontamination of the 500 GPM water treatment system; and began grading and placing stone on the west bank of the west channel adjacent to the Plainwell Dam. Nine sediment confirmation samples (K55338 through K55346) and one duplicate sample (K55347) were collected from Removal Areas 7 and 8. The USEPA collected a split sample of K55343 (APS-121407-12-SD/K55343). Two surface water samples (K30689 and K30690) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 8 for PCB analysis. A duplicate of sample K30690 (K30691) and a rinse blank (K30692) were also collected. Prior to discharge, wastewater samples W_SA3S_Influ_0015 (influent port), W_SA3S_MidA_0014 (midpoint port, right side), W_SA3S_MidB_0015 (midpoint port, left side),

W_SA3S_EffluA_0014 (effluent port, right side), and W_SA3S_EffluB_0015 (effluent port, left side) were collected from the 25 GPM water treatment system located in Staging Area 3S. PCB wipe samples were collected from the influent pipe (Pipe), the first sand tank (Sand), and the first holding tank (Tank 1) of the 500 GPM water treatment system to confirm that the equipment had been properly decontaminated prior to demobilization. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan (non-TSCA material) for disposal.

- During the week of December 17, the KRSG continued work activities in the Phase 1 Cofferdam Area embankment area (material excavation, grading, and demolition of the old powerhouse structure); continued grading and placing stone on the west bank of the west channel adjacent to the Plainwell Dam; and decontaminated and demobilized equipment from the site. Twelve sediment confirmation samples (K55348 through K55359) were collected from Removal Area 6B (excavated in November) and the Phase 1 Cofferdam Area. The USEPA collected a split sample of K55348 (APS-121907-13-SD/K55348). Prior to discharge, wastewater samples W_SA3S_Influ_0016 (influent port), W_SA3S_MidA_0015 (midpoint port, right side), W_SA3S_MidB_0016 (midpoint port, left side), W_SA3S_EffluA_0015 (effluent port, right side), and W_SA3S_EffluB_0016 (effluent port, left side) were collected from the 25 GPM water treatment system located in Staging Area 3S. A PCB wipe sample (VT-1) was collected from the vacuum truck used to transport water between Staging Areas to confirm that the equipment had been properly decontaminated prior to demobilization. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan (non-TSCA material) or the Wayne Landfill in Detroit, Michigan (TSCA material) for disposal.

- No sampling activities were conducted during the week of December 24 or on December 31.

- As of December 31, approximately 37,000 cubic yards of material has been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, 7, 8, the Phase 1 Cofferdam Area, Upland Areas 3A1, 3A2, 4A1 and 6B1, and Islands 1, 2, and 3.

**Laboratory Data Received During the Period**

- During the week of December 3, the KRSG received analytical data for surface water samples K30674 through K30682 (collected in November), sand sample K25752 (collected in November; total petroleum hydrocarbon data was received in November), PCB wipe samples Carbon and Tank 2 through Tank 5, wastewater samples W_SA3S_ Influ_0011, W_SA3S_Influ_0012, W_SA3S_Influ_0013, W_SA3S_Influ_0014, W_SA3S_MidA_0010, W_SA3S_MidA_0011, W_SA3S_MidA_0012, W_SA3S_MidA_0013, W_SA3S_MidB_0011, W_SA3S_MidB_0012, W_SA3S_MidB_0013, W_SA3S_MidB_0014, W_SA3S_EffluA_0010, W_SA3S_EffluA_0011,

W_SA3S_EffluA_0012, W_SA3S_EffluA_0013, W_SA3S_EffluB_0011, W_SA3S_EffluB_0012, W_SA3S_EffluB_0013, W_SA3S_EffluB_0014, and W_SA3S_Dup_0004.

- During the week of December 10, the KRSG received analytical data for sediment confirmation samples K55338 through K55342, wastewater samples W_SA3S_Influ_0015, W_SA3S_MidA_0014, W_SA3S_MidB_0015, W_SA3S_EffluA_0014, and W_SA3S_EffluB_0015, and PCB wipe samples Pipe, Sand, and Tank 1.

- During the week of December 17, the KRSG received analytical data for sediment confirmation samples K55343 through K55359, USEPA sediment confirmation split samples APS-121407-12-SD/K55343 and APS-121907-13-SD/K55348, surface water samples K30683 through K30688 (collected in November), waste water samples W_SA3S_Influ_0016, W_SA3S_MidA_0015, W_SA3S_MidB_0016, W_SA3S_EffluA_0015, and W_SA3S_EffluB_0016, and PCB wipe sample VT-1.

- No analytical data were received during the week of December 24.

- On December 31, the KRSG received analytical data for surface water samples K30689 through K30692.

**Issues Encountered and Actions Taken**

- The sample bottles from the December 6 surface water sampling event broke during shipment to TAL. This information was not known until December 12, which did not leave field personnel enough time to recollect the samples. As such, there are no surface water samples for the week of December 3. In addition, the samples from the December 20 surface water sampling event also broke during shipment to TAL. This information was not known until personnel had demobilized from the site. As such, there are no surface water samples for the week of December 17. Field personnel were instructed to collect two upstream and two downstream samples in the future, in case one bottle should break during transport.

- On December 10, approximately three gallons of hydraulic fluid was released from a tractor trailer (gravel train) traveling on the access road leading from Staging Area 3S to the Meijer parking lot. An emergency spill kit was immediately used to contain the fluid, and the impacted area was excavated shortly thereafter and replaced with clean fill. The impacted material was pugged and processed at Staging Area 3S with the excavated sediment. The truck was inspected for any further leaks; none were observed. No fluid was released in the Meijer parking lot.

- On December 11, erosion was once again observed on the upstream end of Removal Area 7. Erosion was previously observed in this area during the week of November 26. An approximately 2’ x

2' area eroded away, leaving free flowing water between the bank and turbidity curtain/diversion wall. The area was backfilled, regraded, and additional rock was installed to protect the bank from the river currents. A subsequent post-repair inspection at the end of the week revealed the area appeared stable and in good condition. No significant erosion has been observed since that time.

- On December 20, it was determined that excavation activities in the Phase 1 Cofferdam Area could not be completed by December 22, as originally planned. Excavation activities are scheduled to be completed during the week of January 7.

**Developments Anticipated During the Next Reporting Period**

- No activities are scheduled for the week of January 1.

- During the week of January 7, the KRSG is scheduled to complete work activities in the Phase 1 Cofferdam Area embankment area (material excavation and grading) and begin site preparation activities (clearing and grubbing and installation of staging areas and access roads) for the 2008 soil and sediment removal work.

- During the weeks of January 14, 21, and 28, the KRSG is scheduled to continue site preparation activities (clearing and grubbing and installation of staging areas and access roads).

- The KRSG will continue to submit the *Weekly Construction Reports for the Plainwell TCRA* to USEPA and MDEQ in January. The reports will be prepared and submitted on a bi-weekly basis until removal activities resume in the spring of 2008.

- The KRSG will continue to submit copies of analytical data from TCRA sampling activities to USEPA in January.

- Throughout January, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 11 of the TCRA AOC.

**Kalamazoo River Study Group**
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**
**Former Plainwell Impoundment TCRA**
**Monthly Report #10, December 2007**

## Table A — Summary of Property Access Agreements (as of December 31, 2007)

| Date Sent | Property Owner | Status |
|---|---|---|
| 3/19/2007 | A.C. Geenen Associates | NA |
| 3/9/2007 | Aggregate Industries (Bill Smith Sand and Gravel) | accepted |
| 3/9/2007 | Allen Robinson | accepted |
| 3/9/2007 | Balkema Excavating | accepted, amended 9/26/07 |
| 3/9/2007 | Brad Keeler | accepted |
| 3/9/2007 | City of Plainwell | accepted |
| 3/26/2007 | Consumers Energy | accepted |
| 3/9/2007 | Meijer, Inc. | accepted |
| 3/21/2007 | Plainwell Group LLC | accepted |
| 3/16/2007 | Robert Foster Trust | rejected, NA |
| 3/9/2007 | Robert Keeler Trust | accepted |
| 3/9/2007 | Rolfe Family Trust | accepted, extended 10/10/07 |
| 3/16/2007 | Shirley Foster | NA |
| 3/9/2007 | Steven Peterson | accepted |

**Note:**
NA = Not applicable; changes to original design have eliminated the need to access this property.

**Kalamazoo River Study Group**
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**
**Former Plainwell Impoundment TCRA**
**Monthly Report #10, December 2007**

## Table B — Summary of Samples Collected and Data Received in December 2007

| Sample ID | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Location | Analysis Conducted | PCB Result | PCB Action Limit | Response Action |
|---|---|---|---|---|---|---|---|---|---|
| **Sediment Confirmation Samples** | | | | | | | | | |
| K55338 | 12/13/07 | 12/14/07 | 075142 | KAR Labs | RA 7, Grid 8 | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55339 | | | | | RA 7, Grid 8 (BS) | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55340 | | | | | RA 7, Grid 7 | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55341 | | | | | RA 8, Grid 1 | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55342 | | | | | RA 8, Grid 2 | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55343 [1] | 12/14/07 | 12/18/07 | 075172 | KAR Labs | RA 8, Grid 3 | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| ***[K55343] APS-121407-12-SD/K55343*** | | | ***0712311*** | ***[TriMatrix Laboratories]*** | | | ***[< 0.072 mg/kg]*** | ***[5 mg/kg]*** | ***[None]*** |
| K55344 | | | 075172 | KAR Labs | RA 8, Grid 4 | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55345 | | | | | RA 8, Grid 5 | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55346 [K55347] | | | | | RA 8, Grid 6 | PCBs [PCBs] | 1.6 mg/kg [1.1 mg/kg] | 5 mg/kg [5 mg/kg] | None [None] |
| K55348 [1] | 12/19/07 | 12/20/07 | 075211 | KAR Labs | Cofferdam Area 1, Grid 6 | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| ***[K55348] APS-121907-13-SD/K55348*** | | | ***0712366*** | ***[TriMatrix Laboratories]*** | | | ***[0.026 mg/kg]*** [2] | ***[5 mg/kg]*** | ***[None]*** |
| K55349 | | | 075211 | KAR Labs | Cofferdam Area 1, Grid 5 | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55350 | | | | | Cofferdam Area 1, Grid 4 | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55351 | | | 075233 | KAR Labs | RA 6B, Grid 1 (BS) | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55352 | | | | | RA 6B, Grid 2 (BS) | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55353 | | | | | RA 6B, Grid 3 (BS) | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55354 | | | | | RA 6B, Grid 4 (BS) | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55355 | | | | | RA 6B, Grid 5 (BS) | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55356 | | | | | RA 6B, Grid 6 (BS) | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55357 | | | | | RA 6B, Grid 7 (BS) | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55358 | | | | | RA 6B, Grid 8 (BS) | PCBs | < 0.33 mg/kg | 5 mg/kg | None |
| K55359 | 12/20/07 | 12/21/07 | 075249 | KAR Labs | Cofferdam Area 1, Grid 3 | PCBs | 0.7 mg/kg | 5 mg/kg | None |
| **Surface Water Samples** | | | | | | | | | |
| K30674 | 11/13/07 | 12/05/07 | TCRA15_SDSP | TAL | 300' downstream of RA 7 | PCBs | < 0.062 µg/L | - | None |
| K30676 | | | | | 200' upstream of RA 7 | PCBs | < 0.059 µg/L | - | None |
| K30679 | | | | | Rinse Blank | PCBs | < 0.060 µg/L | - | None |
| K30680 | 11/15/07 | 12/07/07 | TCRA16_SDSP | TAL | 300' downstream of RA 7 | PCBs | < 0.057 µg/L | - | None |
| K30681 | | | | | 200' upstream of RA 7 | PCBs | < 0.057 µg/L | - | None |
| K30682 | | | | | Rinse Blank | PCBs | < 0.057 µg/L | - | None |
| K30683 | 11/23/07 | 12/19/07 | TCRA19_SDSP | TAL | 300' downstream of RA 7 | PCBs | < 0.048 µg/L | - | None |
| K30684 | | | | | 200' upstream of RA 7 | PCBs | < 0.048 µg/L | - | None |
| K30685 | | | | | Rinse Blank | PCBs | < 0.048 µg/L | - | None |

See Notes on Page 5.

**Kalamazoo River Study Group**
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**
**Former Plainwell Impoundment TCRA**
**Monthly Report #10, December 2007**

**Table B — Summary of Samples Collected and Data Received in December 2007**

| Sample ID | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Location | Analysis Conducted | PCB Result | PCB Action Limit | Response Action |
|---|---|---|---|---|---|---|---|---|---|
| **Surface Water Samples (Cont'd.)** | | | | | | | | | |
| K30686 | 11/29/07 | 12/20/07 | TCRA21_SDSP | TAL | 300' downstream of RA 8 | PCBs | < 0.063 µg/L | - | None |
| K30687 | | | | | 200' upstream of RA 8 | PCBs | < 0.059 µg/L | - | None |
| K30688 | | | | | Rinse Blank | PCBs | < 0.052 µg/L | - | None |
| K30689 | 12/13/07 | 12/31/07 | TCRA24_SDSP | TAL | 300' downstream of RA 8 | PCBs | < 0.048 µg/L | - | None |
| K30690<br>[K30691] | | | | | 200' upstream of RA 8 | PCBs<br>[PCBs] | < 0.051 µg/L<br>[< 0.049 µg/L] | -<br>- | None<br>[None] |
| K30692 | | | | | Rinse Blank | PCBs | < 0.051 µg/L | - | None |
| **Wastewater Samples** | | | | | | | | | |
| W_SA3S_Influ_0011 | 12/01/07 | 12/04/07 | 074960 | KAR Labs | Staging Area 3S, Discharge 11, influent sample | PCBs | 0.1 µg/L | - | - |
| W_SA3S_MidA_0010 | | | | | Staging Area 3S, Discharge 11, midpoint sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_EffluA_0010 | | | | | Staging Area 3S, Discharge 11, effluent sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_MidB_0011 | | | | | Staging Area 3S, Discharge 11, midpoint sample, left side | PCBs, TSS, P | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.08 mg/L, No Action Limit |
| W_SA3S_EffluB_0011 | | | | | Staging Area 3S, Discharge 11, effluent sample, left side | PCBs, TSS, P | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.07 mg/L, No Action Limit |
| W_SA3S_Influ_0012 | 12/03/07 | 12/05/07 | 074974 | KAR Labs | Staging Area 3S, Discharge 12, influent sample | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_MidA_0011 | | | | | Staging Area 3S, Discharge 12, midpoint sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_EffluA_0011 | | | | | Staging Area 3S, Discharge 12, effluent sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_MidB_0012 | | | | | Staging Area 3S, Discharge 12, midpoint sample, left side | PCBs, TSS | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_EffluB_0012 | | | | | Staging Area 3S, Discharge 12, effluent sample, left side | PCBs, TSS | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |

See Notes on Page 5.

**Kalamazoo River Study Group**
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**
**Former Plainwell Impoundment TCRA**
**Monthly Report #10, December 2007**

## Table B — Summary of Samples Collected and Data Received in December 2007

| Sample ID | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Location | Analysis Conducted | PCB Result | PCB Action Limit | Response Action |
|---|---|---|---|---|---|---|---|---|---|
| **Wastewater Samples (Cont'd.)** | | | | | | | | | |
| W_SA3S_Influ_0013 | 12/05/07 | 12/06/07 | 074994 | KAR Labs | Staging Area 3S, Discharge 13, influent sample | PCBs | 0.2 µg/L | - | - |
| W_SA3S_MidA_0012 [W_SA3S_Dup_0004] | | | | | Staging Area 3S, Discharge 13, midpoint sample, right side | PCBs [PCBs] | < 0.1 µg/L [< 0.1 µg/L] | - [-] | - [-] |
| W_SA3S_EffluA_0012 | | | | | Staging Area 3S, Discharge 13, effluent sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_MidB_0013 | | | | | Staging Area 3S, Discharge 13, midpoint sample, left side | PCBs, TSS | < 0.1 µg/L | - | - |
| W_SA3S_EffluB_0013 | | | | | Staging Area 3S, Discharge 13, effluent sample, left side | PCBs, TSS | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_Influ_0014 | 12/06/07 | 12/07/07 | 075027 | KAR Labs | Staging Area 3S, Discharge 14, influent sample | PCBs | 0.1 µg/L | - | - |
| W_SA3S_MidA_0013 | | | | | Staging Area 3S, Discharge 14, midpoint sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_EffluA_0013 | | | | | Staging Area 3S, Discharge 14, effluent sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_MidB_0014 | | | | | Staging Area 3S, Discharge 14, midpoint sample, left side | PCBs, TSS | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_EffluB_0014 | | | | | Staging Area 3S, Discharge 14, effluent sample, left side | PCBs, TSS | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_Influ_0015 | 12/10/07 | 12/11/07 | 075085 | KAR Labs | Staging Area 3S, Discharge 15, influent sample | PCBs | 0.1 µg/L | - | - |
| W_SA3S_MidA_0014 | | | | | Staging Area 3S, Discharge 15, midpoint sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_EffluA_0014 | | | | | Staging Area 3S, Discharge 15, effluent sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_MidB_0015 | | | | | Staging Area 3S, Discharge 15, midpoint sample, left side | PCBs, TSS | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_EffluB_0015 | | | | | Staging Area 3S, Discharge 15, effluent sample, left side | PCBs, TSS | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |

See Notes on Page 5.

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**Table B — Summary of Samples Collected and Data Received in December 2007**

| Sample ID | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Location | Analysis Conducted | PCB Result | PCB Action Limit | Response Action |
|---|---|---|---|---|---|---|---|---|---|
| **Wastewater Samples (Cont'd.)** | | | | | | | | | |
| W_SA3S_Influ_0016 | 12/18/07 | 12/19/07 | 075205 | KAR Labs | Staging Area 3S, Discharge 16, influent sample | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_MidA_0015 | | | | | Staging Area 3S, Discharge 16, midpoint sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_EffluA_0015 | | | | | Staging Area 3S, Discharge 16, effluent sample, right side | PCBs | < 0.1 µg/L | - | - |
| W_SA3S_MidB_0016 | | | | | Staging Area 3S, Discharge 16, midpoint sample, left side | PCBs, TSS | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA3S_EffluB_0016 | | | | | Staging Area 3S, Discharge 16, effluent sample, left side | PCBs, TSS | < 0.1 µg/L | Monthly Average of 2.6 x 10-5 µg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| **Sand Sample** | | | | | | | | | |
| K25752 | 11/27/07 | 11/29/07 (KAR) / 12/05/07 (TAL) | 074912 (KAR) / TCRA20_SDSP (TAL) | KAR Labs and TAL | Sand from earthen berm constructed downstream of the water control structure | TPH (KAR), TCLP VOCs, TCLP SVOCs, TCLP Pesticides, RCRA Metals, Total PCBs (TAL) | < 0.053 mg/kg | - | None, no constituents exceeded action limits |
| **PCB Wipe Samples** | | | | | | | | | |
| Carbon | 12/05/07 | 12/08/07 | 074995 | KAR Labs | First carbon tank of the 500 GPM water treatment system | PCBs | < 0.1 µg/100 $cm^2$ | 10 µg/100 $cm^2$ [3] | None |
| Tank 2 | | | | | Second holding tank of the 500 GPM water treatment system | PCBs | < 0.1 µg/100 $cm^2$ | 10 µg/100 $cm^2$ [3] | None |
| Tank 3 | | | | | Third holding tank of the 500 GPM water treatment system | PCBs | < 0.1 µg/100 $cm^2$ | 10 µg/100 $cm^2$ [3] | None |
| Tank 4 | | | | | Fourth holding tank of the 500 GPM water treatment system | PCBs | 0.1 µg/100 $cm^2$ | 10 µg/100 $cm^2$ [3] | None |
| Tank 5 | | | | | Fifth holding tank of the 500 GPM water treatment system | PCBs | 0.2 µg/100 $cm^2$ | 10 µg/100 $cm^2$ [3] | None |
| Pipe | 12/10/07 | 12/11/07 | 075077 | KAR Labs | Influent pipe of the 500 GPM water treatment system | PCBs | < 0.1 µg/100 $cm^2$ | 10 µg/100 $cm^2$ [3] | None |
| Sand | | | | | First sand tank of the 500 GPM water treatment system | PCBs | < 0.1 µg/100 $cm^2$ | 10 µg/100 $cm^2$ [3] | None |
| Tank 1 | | | | | First holding tank of the 500 GPM water treatment system | PCBs | < 0.1 µg/100 $cm^2$ | 10 µg/100 $cm^2$ [3] | None |
| VT-1 | 12/20/07 | 12/21/07 | 075249 | KAR Labs | Interior of the vacuum truck used to move water between staging areas | PCBs | 0.3 µg/100 $cm^2$ | 10 µg/100 $cm^2$ [3] | None |

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## Table B — Summary of Samples Collected and Data Received in December 2007

**Notes:**
1 - Split sample collected by USEPA.
2 - Estimated.
3 - The decontamination standard for non-porous materials previously in contact with PCB-containing liquid according to Federal Regulations (Title 40, Chapter 1, Subchapter R, Part 761.79.3).
* USEPA split samples are shown in bold and in brackets. USEPA split sample IDs are shown in bold and italicized font.
* Duplicate samples are shown in brackets.
* Analytical results have not been validated.

(BS) - Bank Sample.
$cm^2$ - square centimeters.
GPM - Gallons Per Minute.
P - Phosphorus.
PCB - Polychlorinated Biphenyls.
RA - Removal Area.
RCRA - Resource Conservation and Recovery Act.
SVOCs - Semi-Volatile Organic Compounds.
TAL - TestAmerica Laboratories.
TCLP - Toxicity Characteristic Leaching Procedure.
TPH - Total Petroleum Hydrocarbons.
TSS - Total Suspended Solids.
VOCs - Volatile Organic Compounds.
mg/kg - milligrams per kilogram.
mg/L - milligrams per liter.
µg/L - micrograms per liter.